

BEFORE THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION

EDWARD C. SNUKIS, JR. and
SAMANTHA SNUKIS,
Co-Administrators of the Estate of
Edward C. Snukis,

Plaintiffs,

v.

CASE NO. 3:21-cv-00135-TWP-MPB

CITY OF EVANSVILLE, INDIANA;
MATTHEW O. TAYLOR, in his individual
capacity as an Evansville police officer;
TREVOR KOONTZ, in his individual
capacity as an Evansville police officer; and
NICHOLAS HACKWORTH, in his
individual capacity as an Evansville police officer,

Defendants.

PLAINTIFFS' PRELIMINARY WITNESS AND EXHIBIT LIST

Come now the Plaintiffs, the Co-Administrators of the Estate of their father, Edward C. Snukis, by counsel, Mark E. Miller, for their Preliminary Witness and Exhibit List and provide:

All information disclosed herein is produced without waiver of or prejudice to Plaintiffs' rights to assert any applicable objection, privilege, and protection, and such rights are hereby expressly reserved. Plaintiffs further expressly reserve the right to amend, clarify or further supplement these disclosures with additional information, documents, electronically stored information ("ESI"), and tangible things, that may be discovered at a future time and that otherwise would be subject to disclosure pursuant to the Case Management Plan and Federal Rules of Civil Procedure. Further, nothing herein shall be, or be construed to be, any stipulation of any sort whatsoever.

Preliminary Witnesses

At the trial of this cause, Plaintiffs may call as witnesses, in addition to witnesses that may be called solely for purposes of impeachment, rebuttal or surrebuttal, any of the following:

1. Edward C. Snukis, Jr., son of the decedent.
2. Samantha Snukis, daughter of the decedent.
3. Sierra Snukis, daughter of the decedent.
4. Lucille Snukis, mother of the decedent.
5. Matthew Taylor, EPD police officer, events on September 13, 2019.
6. Trevor Koontz, former EPD police officer, events on September 13, 2019.
7. Nicholas Hackworth, EPD police officer, events on September 13, 2019.
8. John McQuay, EPD police officer, events on September 13, 2019.
9. Sgt. Brown, EPD police officer, events on September 13, 2019.
10. J. Holden, EPD police officer, events on September 13, 2019.
11. D.H. Vonderscher, EPD police officer, events on September 13, 2019.
12. Jason Cullum, former EPD police officer, reporting of events on September 13, 2019.
13. Stephen Wynn Lockyear, Vanderburgh County Coroner, autopsy of the decedent.
14. Christopher J. Kieffer, MD, performed the autopsy of the decedent.
15. Tammy Bowles, assisted with the autopsy.
16. Dave Anson, Vanderburgh County Coroner employee present during the autopsy.
17. Doug Hamner, EPD police officer present during the autopsy.
18. Vernon Lutz, EPD police officer present during the autopsy.

19. Aaron Kennedy, EPD police officer present during the autopsy; investigation of the wrongful death of decedent.
20. J. Lewis, EPD police officer, investigation of the wrongful death of the decedent.
21. Unknown employees of the Evansville Police Department, present during the events on September 13, 2019.
22. Unknown employees of the Evansville Fire Department, present during the events on September 13, 2019.
23. Cyril Jeffrey Fraker, 933 Stanley Avenue, Evansville, IN 47711-3445, D-Patrick Honda employee, witness to events on September 13, 2019.
24. Derrick Spencer Norton, 401 Lant Lane, Evansville, IN 47715-347, D-Patrick Honda employee, witness to events on September 13, 2019.
25. Matt Madden, D-Patrick Honda employee, witness to events on September 13, 2019.
26. Devon Holly, D-Patrick Honda employee, witness to events on September 13, 2019.
27. Dennis Smiley, D-Patrick Honda employee, witness to events on September 13, 2019.
28. Kylena Page, D-Patrick Honda employee, witness to events on September 13, 2019.
29. Brentlee Spurlock, 6819 Clift Wood Drive, Evansville, IN 47712, witness to the events on September 13, 2019.
30. Stephanie Dawn Spurlock, 6819 Clift Wood Drive, Evansville, IN 47712, witness to the events on September 13, 2019.

31. Chrisney Johnson, aka Chrisney McGowan, Premier Trucking security guard, witness to the events on September 13, 2019.
32. All parties and representatives of parties to this action.
33. Such other persons as discovery and/or investigation may reveal.
34. Any person listed as a witness by or on behalf of any other party to this action.
35. Any person present at trial of this matter at the request of another party to this action.
36. Custodians of records solely for the purpose of authentication of those records.
37. Persons identified in discovery including depositions.
38. All persons whose identity and relevant knowledge at this time is unknown but may be discovered between now and the trial of this matter.

Plaintiffs reserve the right to supplement this list and add additional witnesses and call as witnesses at trial individuals who are not identified herein. Identification of a witness does not constitute a representation that such person has information that is non-privileged, nor does it constitute a waiver of any privilege or objection that may be made to such person's testimony.

Preliminary Exhibits

At the trial of this cause, Plaintiffs may offer as exhibits, in addition to exhibits offered solely for the purpose of impeachment, rebuttal or surrebuttal, any of the following:

1. Photographs of the decedent and his family.
2. Autopsy report and photographs of the decedent obtained from the Vanderburgh County Coroner's office.
3. Documents, electronically stored information, and tangible things obtained from counsel for the Evansville Police Department on October 8, 2020, and April 12, 2021.

4. Documents, electronically stored information, and tangible things obtained from Evansville/Vanderburgh Central Dispatch.
5. Documents obtained from counsel for the Evansville Fire Department.
6. Documents obtained from American Medical Response Indiana.
7. Documents obtained from Ascension St. Vincent Evansville.
8. Video recording of City press conference, September 16, 2019.
9. Plaintiffs' documents and ESI that support Plaintiffs' claims and defenses to claims made by Defendants against Plaintiffs.
10. Defendants' documents and ESI that support Plaintiffs' claims and defenses to claims made by Defendants against Plaintiffs.
11. All documents produced in discovery in this matter.
12. Such other documents as discovery and/or investigation may reveal.
13. Any document or other thing listed as an exhibit by or on behalf of any other party to this action.
14. Any pleading, motion, order, written discovery request and response, or other document filed of record or exchanged in this cause.
15. All depositions taken in this matter.
16. Any and all exhibits to or documents referenced in the depositions taken in this matter.
17. Any document, diagram, photograph, or other tangible thing pertaining to this lawsuit and previously identified or produced by or on behalf of any other party.
18. Any and all documents necessary to establish the admissibility of documents or testimony.

19. Any and all documents necessary to show credentials, certifications or classifications related to employment, education or experience.
20. Such other documents to be identified later as discovery and investigation of this matter are still ongoing.

Plaintiffs reserve the right to supplement this list and add additional documents and things that may be offered as exhibits at trial. Identification of an exhibit does not constitute a waiver of any privilege or objection that may be made to the use of such document or thing at trial. Plaintiffs specifically reserve the right to use and rely upon at trial, documents, ESI, and tangible things subsequently identified by Plaintiffs or produced by other parties or third parties in connection with this case.

Respectfully submitted,

By: /s/ Mark E. Miller

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Certificate of Service and Compliance

I hereby certify that on January 17, 2022, I electronically filed the foregoing
PLAINTIFFS' PRELIMINARY WITNESS AND EXHIBIT LISTS with the Clerk of the Court
using the CM/ECF system, which will send notification of such filing to:

Keith W. Vonderahe

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By: /s/ Mark E. Miller

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